February 21, 2003

TO: Internal File

FROM: Karl R. Houskeeper, Environmental Scientist III, Team Lead

RE: South Portals, Genwal Resources, Inc., Crandall Canyon Mine, C/015/032-02A-1

SUMMARY:

The Division received proposed changes to Genwal Resources Inc., Crandall Canyon Mine on July 17, 2002. The proposed changes involve the construction of three new portals in the coal outcrop located on the southern slopes of the existing disturbed area. The plan calls for the installation of one new culvert, a ventilation fan, three portal face up's, and a conveyor belt in order to access the coal reserves on the southern side of the canyon.

Amendment AM02A was found deficient by the Division on September 19, 2002. The operator responded to deficiencies in AM02A on November 22, 2002; however, several items necessary for Division review were not included. This submission was assigned as AM02A-1. On January 28, 2003, the operator provided the missing material in AM02A-1 for Division review. The missing material included reclamation costs pertaining to the redistribution of soils and the removal and/or demolition of the coal conveyor, portal face up's, culvert, and ventilation fan.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

Analysis:

The pages included in the permit amendment have been revised to include revision dates as a footnote in the lower left hand corner.

Findings

The requirements of this section of the regulations are considered adequate in regard to the proposed permit change.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

Information on pages 5-30a – 5-30c has been revised to include the type of materials used, size and/or dimensions of the portal face ups. Information on the conveyor belt size length and construction are addressed. The proposed ventilation fan and respective specifications are noted. The ventilation fan will not use a diesel back in case of power failure; therefore, a diesel fuel tank and containment are not required. Access to the travel portal will be via the existing mine pad. Since the access utilizes the existing pad area a road designation of primary or ancillary are not assigned. During reclamation the structures will be removed, portals sealed and backfilled, and highwalls will be put to AOC.

Findings

The requirements of this section of the regulations are considered adequate in regard to the proposed permit change.

AIR POLLUTION CONTROL PLAN

Regulatory Reference: 30 CFR 784.26, 817.95; R645-301-244, -301-420.

Analysis:

On December 16, 2002, Meteorological Solutions Inc., on behalf of the operator, submitted proposed changes and additions to the approved air quality permit DADE- 827-01 to the State of Utah, Division of Air Quality.

Findings

The requirements of this section of the regulations are considered adequate in regard to the proposed permit change. Once the proposed changes and additions are approved, by the State of Utah, Division of Air Quality, a copy of the new permit should be submitted to the Division for incorporation into the approved MRP.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

Plate 5-2, Crandall Canyon #1 Mine Mining Projections, has been revised to show three portals. A 200' barrier between the mining activities and the outcrop is also shown on Plate 5-2 as indicated on Page 5-21 of the approved MRP. The amendment indicates that the current subsidence plan covers this area of mining activity. Current baseline data for Hydrologic, geologic, and climatologic information applies to the areas proposed in the amendment.

Findings:

The requirements of this section of the regulations are considered adequate in regard to the proposed permit change.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mine Workings Maps

Plate 5-2, Crandall Canyon #1 Mine Mining Projections, has been revised to show three portals. A 200' barrier between the mining activities and the outcrop is also shown on Plate 5-2 as indicated on Page 5-21 of the approved MRP. The amendment indicates that the current subsidence plan covers this area of mining activity.

Certification Requirements

Plate 5-2, 5-3, and 7-5 included in this submittal contain a P.E. stamp accompanied by a signature and date.

Findings:

The requirements of this section of the regulations are considered adequate in regard to the proposed permit change.

RECOMMENDATIONS:

Concerns listed in AM02A have been properly addressed in AM02A-1, as noted above. There are no deficiencies under the listed items above. It is recommended that the amendment be approved for the items in this memo.

O:\015032.CRA\FINAL\krh02A-1.doc